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March 16, 2021

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DATE FILED: 3/19/2021

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Honorable Edgar Ramos Thurgood Marshall U.S. Courthouse 40 Foley Square Courtroom 619 New York, New York 10007

MEMO ENDORSED

Case Title: Kirk Kara Corp. v. M.D.C. Diamonds International Inc.,

et al;

1:20-cv-01762-ER

Re: Request for Adjournment

Your Honor:

Our office represents Plaintiff Kirk Kara Corp. ("Kirk Kara") in this copyright infringement matter. We write pursuant to Rule 1E of Your Honor's Individual Practices to respectfully request a 30-day adjournment of the hearing currently scheduled for Thursday, March 18 at 11:00 am. The reason for this request is that the parties are currently engaged in settlement discussions. The additional time would allow the parties to negotiate a resolution and conserve judicial resources. There have been no previous requests for an extension.

Plaintiff has also provided a copy of this request to a representative for defendant via email.

We thank Your Honor for your consideration of this request.

Respectfully submitted,

By: /s/ Scott Alan Burroughs

Scott Alan Burroughs Laura M. Zaharia

DONIGER / BURROUGHS

For the Plaintiff

The March 18 default hearing is hereby adjourned to April 23, 2021 at 11:00 a.m. The hearing will occur remotely and by telephone. The parties are instructed to dial (877) 411-9748 and enter access code 3029857# when prompted. Plaintiff is directed to provide a copy of this order to Defendant.

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SO ORDERED.

Edgardo Ramos, U.S.D.J

Dated: 3/19/2021

New York, New York